

## **Hidden Hearing – Modern Slavery Statement**

### **Introduction**

Hidden Hearing is committed to being a responsible employer and will seek the same from its suppliers.

### **Organisational structure and supply chains**

Hidden Hearing is a private hearing aid specialist with more than 50 years' experience and over 300 locations nationwide. The Head Office is in Maidstone, Kent and the organisation is owned by Demant A/S, a quoted Danish hearing healthcare Company.

In 2010, Demant joined the United Nations Global Compact. The Group reports annually on its actions and initiatives based on the 10 UNGC principles in the four areas of human rights, labour rights, environmental and anti-corruption actions. The Group believes this helps to scope its commitment to corporate responsibility and align strategies and goals.

Hidden Hearing has approximately 470 employees in four main categories, Hearing Aid Dispensers, Branch Coordinators, Support and Management. We use some temporary agency staff whom we book through an approved list of recruitment agencies. The majority of products we sell are manufactured by Demant in Poland. We purchase other goods and services from a range of providers, the four largest in terms of budget spend being shop rentals, cars, IT and marketing services.

All our Hearing Aid Dispensers are registered with the Health and Care Professions Council which has a professional code of conduct.

We pay above the National Minimum Wage for all employees.

### **Countries of operation and supply**

We operate in England, Wales and Scotland.

### **Responsibility**

The Board of Directors of Hidden Hearing is responsible for the development and review of policies.

The responsibility for risk assessment in the context of human rights and modern slavery has been delegated by the Board to the Head of Human Resources.

### **Responsibility for investigations/due diligence:**

- Head of Human Resources: Employment and use of agency staff.
- Health and Safety Manager: Estate contractors and sub-contractors
- Finance Director: Suppliers

### **Relevant policy, procedures and values**

**Whistleblowing policy** – Employees can report genuine concerns related to the direct activities, or the supply chains of our business, including any circumstances that may give rise to an enhanced risk of slavery or human trafficking, by using this policy. This policy is designed to enable employees to make disclosures without fear of retaliation. For our full Whistleblowing policy, please click on the following link.

<http://hhuk-connect/lookup/ layouts/15/WopiFrame.aspx?sourcedoc={1DD6CC22-979C-4F90-AB70-584E1154986B}&file=Whistleblowing%20Policy%202018.pdf&action=default>

- **Best Practice Recruitment Guidelines** – we have a thorough 11-step recruitment process driven by HR to ensure that our recruitment practices meet and where possible exceed our legal responsibilities. We provide training to all employees involved in the recruitment process.
- **Temporary Staff** - we use an approved list of reputable employment agencies and verify the practices of any new agency added to that list. We currently use Adecco agencies for temporary staff; they have a zero-tolerance approach to modern slavery and human trafficking within their business and supply chains. They published their first statement last year and since then have continued to increase their work in this area.
- **Employee code of conduct** – Our Staff Handbook makes clear the actions and behaviours expected of our employees at work and representing the company. We strive to maintain the highest standards of employee conduct, engagement and ethical behaviour across the business.

### **Monitor and Review**

We assess risk using the Slavery and Trafficking (SaT) Risk Assessment template. The most recent assessment was carried out by the Head of Human Resources and the Finance Director. We will review, at least annually, how we operate in the light of this assessment to ensure the embedding of respect for human rights and zero tolerance of modern slavery.

### **Board approval**

This statement was approved on 22<sup>nd</sup> May 2019 by the organisation's board of directors, who will review and update it annually.

Director's signature:

A handwritten signature in black ink, appearing to read 'Graham Lane', with a small dash at the end.

Director's name:

Graham Lane, Managing Director

Date:

22<sup>nd</sup> May 2019